

Using the Title I Homeless Set Aside Funds

All public schools and districts receiving federal fund must ensure that services are provided to children and youth who are experiencing homelessness. To assist with these services, the law requires that school districts set aside Title I funds, as necessary, to provide services comparable to those that are provided to children in Title I, Part A funded schools. These funds can also support educationally related services to children in shelters and other locations where homeless children may live. The services provided with these funds should support homeless students to succeed in school and to meet the academic achievement standards.

Comparable services may not necessarily mean the same services; therefore, these funds may also be used to provide services that are not ordinarily provided to other Title I students.

If a district has students who meet the definition of homelessness according to McKinney-Vento, listed below are some strategies on how Title I homeless set-aside funds may be used. These funds can be used to assist homeless students in Title I and Non-Title I schools.

Allowable Uses of Title I set aside:

- Tutoring services (remedial or accelerated instruction), especially in shelters or other locations where homeless students live
- Before-school/after-school, and/or summer programs
- Services to enable students to enroll in, attend, and succeed in school
- Personal school supplies such as backpacks and notebooks
- Items of clothing to meet a school's dress or uniform requirements
- Shoes necessary to participate in physical education classes
- Student fees necessary to participate in the general education program
- Graduation cap and gown / graduation fees
- Birth certificates necessary to enroll in school
- Counseling services / domestic violence counseling services
- Parental involvement specifically oriented to reaching out to parents of homeless students
- Costs for attaining a GED for parents participating in Head Start or Even Start
- Homeless awareness activities
- Research-based programs that benefit highly mobile students
- Fees for SAT/ACT testing if not waived by college or university
- Cost of GED for an unaccompanied homeless youth
- Health related services may be allowed if funds are not reasonably available from public or private sources (as a last resort, health, nutrition, other services such as eyeglasses and hearing aids, immunizations, and dental needs).

Not Allowable:

- Physicals for sports participation or sports uniforms
- Clothing for family members
- Rent/motel/hotel (any housing expenses)
- Prom dresses/tuxedos
- Yearbooks fees

Supplement, Not Supplant

It is a requirement that federal Title I funds cannot supplant other state or local funds, but should supplement (expand on or increase) the current services offered. In other words, Title I funds cannot be used for initiatives that are a part of the core services provided by public schools and services that schools are required to provide (even in the absence of Title I funding).

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Mandatory Reservation of Title I, Part A Funds for Homeless Education

Section 1113 (c)(3)(A) of NCLB states, "A local educational agency shall reserve such funds as necessary under this part to provide services comparable to those provided to children in schools funded under this part to serve homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where children may live."

The LEA must identify set aside funds for services to homeless children as part of the online Title I application. This set aside is required when students that attend non-Title I buildings are identified as meeting the McKinney-Vento Act definition of homelessness. The set aside funds may then be used to serve the needs of any homeless students in the district.

School districts must establish their own method for allocating Title I, Part A, set asides for homeless children and youth who are not attending Title I schools. Generally, these methods involve conducting a needs assessment for homeless students in the school district or basing the set-aside amount on a formula, such as a per pupil expenditure. Determining an appropriate amount requires coordination between the Title I Coordinator and the Homeless Education Liaison.

Iowa requires districts to indicate the Title I, Part A homeless aside amount and formula on the annual Title I application

Below are some methods that may be used to calculate the local Title I, Part A set aside

Method #1: Reserve the set aside amount based on anticipated needs of homeless student. Based on the district's prior years expenses related to fulfilling the requirements set out in §722(g)(6) of McKinney-Vento, set aside an amount that will allow the district to provide appropriate services.

Method #2: Reserve the set aside amount based on the homeless student count from previous year Spring SRI and Title I, Part A per-pupil allocation. To reserve funds by using this method, take the homeless children & youth count multiplied by the Title I, Part A per-pupil allocation.

Method #3: Reserve the set aside amount on percentage. A specific percentage of funds for homeless children and youth can be reserved based on the Title I, Part A allocation, or on the district's poverty data. Generally, if the district has a higher poverty percentage, the district will also have a higher number of homeless children and youth.

Method #4: Reserve the set aside amount based on free/reduced lunch count. Statistically, 10% of children living in poverty will experience homelessness within any given year. * Using the free/reduced lunch count, estimate the number of homeless students in your district who may experience homelessness this school year. For example:

- a. The district's free/reduced lunch count=100 students
- b. 10% of whom could become homeless=10 students
- c. The district's Title I Part A per pupil allocation is \$755 per student
- d. Using this method the Title I, Part A Homeless set-aside would be \$7,550.00

As part of the Title I, Part A on-line application, all districts will:

- indicate the method chosen to set aside an amount for homeless children and youth.
- indicate the Title I dollar amount set aside for Homeless Student Services based on the number of homeless students in non-Title I buildings (including middle schools and high schools).
- describe how the services for homeless students attending non-Title I buildings will be coordinated and integrated with Title I, Part A services and relate to the set aside funds.

Homeless Education Assurances

If the school district has not identified homeless children and youth, it is not required to reserve Title I, Part A funds. However, all districts must assure the following requirements for outreach & identification have been met according to the McKinney-Vento Homeless Education Assistance Improvement Act of 2001:

- The local school district has appointed a homeless education liaison.
- Public notice of the educational rights of homeless children/youth is disseminated where such children and youths receive services under the McKinney-Vento Act, such as schools, family shelters, and soup kitchens.
- The liaison collaborates with local service providers such as social services, shelter staff, and other community support services to ensure identification of homeless children and youth.
- The school district has established a process to identify homeless students in its local student data record system.

NEW U.S. Department of Education Policy Change – FY2014

Title I Set Aside Funds for Support of Homeless Children and Youth

The following New information applies only to funds subject to authority in FY2014 appropriations act

The FY 2014 omnibus finding bill included a significant policy change regarding the use of Title I, Part A funds to support homeless children and youth. The legislation specifically allows the use of Title I, Part A dollars to "...provide homeless children and youths with services not ordinarily provided to other students under those sections, including supporting the liaison designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act, and providing transportation pursuant to section 722(g)(1)(J)(iii) of such Act."

This policy will apply to the FY2014 Title I, Part A funding (Basic, Concentration, and Targeted Grants) that becomes available to States on July 1, 2014. It reserves a U.S. Department of Education interpretation of the Title I, Part A statute which prohibited the use of Title I, Part A dollars to transport homeless children and youth to their schools of origin. It also clarifies that Title I, Part A dollars can serve the unique needs of homeless students by providing services difference from those ordinarily provided with Title I, Part A funds, and that Title I, Part A funds can support McKinney-Vento homeless liaisons.

Visit <http://center.serve.org/nche/legis/2014-omnibus.php> for more information about Title I & homelessness and the requirement for school districts to reserve funds to provide educationally related support services to homeless children.

What does this mean?

FY 2014 Title I, Part A Funds Can be Used for School of Origin Transportation, but the required set aside for comparable services must still be reserved. The Appropriations Act affords an LEA new, additional authority to use fiscal year 2014 Title I funds to pay for the homeless liaison FTE and for the excess cost to transport homeless students to their school of origin. **However**, this option does not replace the required (or regular) homeless set aside. (See page 1-2 of this handout).

US Department of Education Letter: <http://center.serve.org/nche/downloads/titlei-dcl-jul-2014.pdf>

- The new authority in the FY 2014 appropriations act in no way removes the requirement under section 1113(c)(3)(A) of the Elementary and Secondary Education Act of 1965, as amended (ESEA), that a local educational agency (LEA) reserve the amount of Title I funds that is necessary to provide comparable Title I services to homeless children attending non-Title I schools.
- An LEA may continue to use Title I set aside funds to provide comparable services to homeless students attending Title I schools and non-Title I schools that are not ordinarily provided to other Title I students, such as those described in Question G-11 of the Title I, Part A Use of Funds guidance.
Visit <http://www2.ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.doc> for Title I Use of Funds guidance.
- The new "Optional" reservation **does not replace** the section 1113(c)(3)(A) requirement:
 - Transportation: New authority expands the use of Title I set aside funds to be used for incremental cost of transporting homeless children/youth to & from the school of origin. This option is additional to the Required set aside funds used to provide reasonable and necessary services for instructional and educational support.
 - Support of Homeless Liaison: supporting the liaison designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act. For salary support devoted to liaison duties up to the full FTE.

Examples

District A: reserves \$5000 as the Title I homeless set aside for instructional and related services to homeless children/youth. Under section 1113(c)(3)(A), this is the Required reservation for comparable services. District A may reserve an Optional amount for incremental costs of transporting homeless students to/from school of origin.

Title I Homeless Set Aside = Required \$5000 plus the Optional \$2000 for transportation

- Required Set Aside =\$5000 (services such a tutoring, etc)
- Optional Set Aside = \$2000 (incremental transportation costs)

District B: reserves \$5000 as the Title I homeless set aside for comparable service as required, but chooses not to reserve for incremental costs of transportation to/from school of origin.

- Required Set Aside =\$5000 (services such a tutoring, etc.)
- Optional Set Aside = \$0 (incremental transportation costs)

❖ The **Optional** Set Aside does not replace the **Required** Set Aside for comparable services.